## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

In Re: Krystle Shaw and Elvyn Shaw Case No. 12-30882-KRH

Chapter 13

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JPMorgan Chase Bank, National Association, Movant

vs.

Krystle Shaw, Debtor aka Krystle R. Shaw Elvyn Shaw, Debtor

Suzanne E. Wade, Trustee

Respondent(s)

## NOTICE OF MOTION FOR RELIEF FROM STAY AND HEARING THEREON Real Property at 3800 Hyde Park Drive, Hopewell, Virginia 23860

JPMorgan Chase Bank, National Association, Movant herein, has filed papers with the court seeking relief from the automatic stay of 11 U.S.C. Sec. 362 (a) to enable it to proceed with the foreclosure of its Deed of Trust. Your rights may be affected. You should read these papers carefully and discuss them with your lawyer, if you have one in this bankruptcy case. (If you do not have a lawyer, you may wish to consult one.)

The hearing is scheduled for <u>April 8, 2015 at 11:00 a.m.</u> in Courtroom 5000, United States Bankruptcy Court, 701 East Broad Street, Richmond VA 23219. If you do not want the court to grant the motion for relief from stay, or if you want the court to consider your views of the motion, then by <u>March 12, 2015</u>, you or your lawyer must file a written response with the Clerk of the Bankruptcy Court explaining your position and mail a copy to:

Justina Martynaityte, Esq. Attorney for Movant 312 Marshall Avenue, #800 Laurel, Maryland 20707

If you mail, rather than deliver your response to the Clerk of the Bankruptcy Court for

filing, you must mail it early enough so that the court will receive it by the date stated above.

IF YOU OR YOUR LAWYER DO NOT TAKE THESE STEPS BY THE DEADLINE, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE MOTION AND MAY GRANT OR OTHERWISE DISPOSE OF THE MOTION BEFORE THE SCHEDULED HEARING DATE.

DATE: February 26, 2015

/s/ Justina Martynaityte, Esq. [jm]
Attorney for Movant
Bar No. 86858
312 Marshall Avenue, #800
Laurel, MD 20707
301-490-1196
bankruptcyva@mwc-law.com

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed, first class, postage prepaid, on February 26, 2015, to Krystle Shaw at 3800 Hyde Park Dr, Hopewell, Virginia 23860 and Elvyn Shaw at 3800 Hyde Park Dr, Hopewell, Virginia 23860. Copies were sent electronically via the CM/ECF system to Robert B. Duke, Jr., Esq., Attorney for Debtors and Suzanne E. Wade, Trustee.

/s/ Justina Martynaityte, Esq.